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9 Attorneys for Defendant  
CITY AND COUNTY OF SAN FRANCISCO

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11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA

13 SELINA KEENE, MELODY FOUNTILA,  
14 MARK MCCLURE,

15 Plaintiffs,

16 vs.

17 CITY and COUNTY OF SAN FRANCISCO

18 Defendant.

19 Case No. 22-cv-01587-JSW

**DECLARATION OF LAUREN E. WOOD IN  
SUPPORT OF DEFENDANT'S  
ADMINISTRATIVE MOTION TO SET CASE  
MANAGEMENT CONFERENCE**

**Civil Local Rule 7-11**

20 Filed: March 14, 2022  
21 Trial Date: None set.

1 I, LAUREN E. WOOD, hereby declare:

2 1. I am a Deputy City Attorney for the City and County of San Francisco. I am counsel of  
3 record for Defendant City and County of San Francisco (the “City”). I am admitted to practice law in  
4 California and to appear before this Court. I have personal knowledge of the facts in this declaration,  
5 and if called upon to testify, I could and would testify competently to the facts contained herein.

6 2. Plaintiffs’ Ninth Circuit Appeal of the denial of their Motion for Preliminary Injunction  
7 has been fully briefed and oral argument has been scheduled for April 18, 2023.

8 3. On Friday, March 24, 2023, I contacted Plaintiffs’ counsel of record, Russell Davis, via  
9 email to inquire as to whether Plaintiffs would stipulate to request that a Case Management  
10 Conference be set for April 28, 2023 to coincide with the Case Management Conferences set in the  
11 five other related actions pending before this Court: *Gozum v. CCSF*, No. 4:22-cv-03975-JSW;  
12 *Guardado, et al. v. CCSF*, No. 4:22-cv-04319-JSW; *Shaheed, et al. v. CCSF*, No. 4:22-cv-06013-JSW;  
13 *Debrunner, et al. v. CCSF, et al.*, No. 4:22-cv-07455-JSW; *Cook v. CCSF*, No. 4:22-cv-07645-JSW  
14 (referred to collectively as “the Related Vaccine Actions”). Plaintiffs’ counsel replied, “send the  
15 stipulation.” I promptly prepared and sent a stipulation and proposed order for counsel’s review that  
16 same day. A true and correct copy of my March 24, 2023 email exchange with counsel is attached  
17 hereto as **Exhibit A**.

18 4. Thereafter, I sent follow-up emails to Plaintiffs’ counsel requesting either approval of  
19 the stipulation or for counsel to provide proposed edits or comments. The last such email was sent on  
20 March 29, 2023. Because the desired Case Management Conference date is less than one month away,  
21 the City is making its request to have a Case Management Conference set for April 28 via  
22 administrative motion to ensure that the Court will have the opportunity to rule on the request  
23 sufficiently in advance of both the requested Case Management Conference date and the attendant  
24 deadline for submitting a Joint Case Management Conference Statement.

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1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct. Executed March 30, 2023, at Oakland, California.  
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5 */s/ Lauren E. Wood*  
6 LAUREN E. WOOD  
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# EXHIBIT A

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**From:** Wood, Lauren (CAT)  
**Sent:** Friday, March 24, 2023 4:49 PM  
**To:** 'Russell Davis'  
**Cc:** Emery, Jim (CAT); Blum, David (CAT)  
**Subject:** RE: Keene, et al. v. CCSF - No. 4:22-cv-01587-JSW - Request for Case Management Conference  
**Attachments:** Keene - Stip & Proposed Order to Set CMC.DOCX

Hi Russell,

Please see the attached stipulation and proposed order requesting a CMC on April 28, with the joint case management statement due 7 days in advance. Please let us know if we may file the attached using your electronic /s/ signature.



Thank you,

Lauren

**Lauren E. Wood** (she/her)  
Deputy City Attorney  
Office of City Attorney David Chiu  
(415) 554-4261 Direct  
Email: [lauren.wood@sfcityatty.org](mailto:lauren.wood@sfcityatty.org)  
[www.sfcityattorney.org](http://www.sfcityattorney.org)

*Note: Due to hybrid work arrangements, email is the best way to reach me.*

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**From:** Russell Davis <[loanhound@sbcglobal.net](mailto:loanhound@sbcglobal.net)>  
**Sent:** Friday, March 24, 2023 10:33 AM  
**To:** Wood, Lauren (CAT) <[Lauren.Wood@sfcityatty.org](mailto:Lauren.Wood@sfcityatty.org)>  
**Subject:** Re: Keene, et al. v. CCSF - No. 4:22-cv-01587-JSW - Request for Case Management Conference

send the stipulation.

Russ

On Friday, March 24, 2023 at 10:30:25 AM PDT, Wood, Lauren (CAT) <[lauren.wood@sfcityatty.org](mailto:lauren.wood@sfcityatty.org)> wrote:

Hi Russell,

As you may have learned from your colleague Kevin, the case management conferences in the five related cases challenging the City's COVID-19 Vaccination Policy have all been reset to April 28, 2023 at 11:00 a.m. before Judge White, with joint case management conference statements due April 21. I've attached the orders in the other cases PJI is handling, *Shaheed* and *Guardado*, for reference.

The City proposes that the parties request the Court to set a case management conference in *Keene* for April 28, 2023 to coincide with the CMC for the other related actions. Now that the case management conference will be held *after* oral argument before the Ninth Circuit, the City does not see any reason why this case should not proceed along with the other related actions.

Please let me know if Plaintiffs will stipulate to moving the CMC to April 28; if so, the City will prepare a stipulation and proposed order for your review. If Plaintiffs decline to stipulate, the City will file an administrative motion requesting such relief.

Kind regards,

Lauren



**Lauren E. Wood (she/her)**

Deputy City Attorney

Office of City Attorney David Chiu

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Email: [lauren.wood@sfcityatty.org](mailto:lauren.wood@sfcityatty.org)

[www.sfcityattorney.org](http://www.sfcityattorney.org)

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